

FILED

APR 11 2017

By PATRICK KEANEY
Clerk, U.S. District Court
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMPSON CHRISTOPHER KYLE
MANDRELL,

Defendant.

SEALED

Case No.

CR 17-023-RAW

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

**POSSESSION OF CERTAIN MATERIAL
INVOLVING THE SEXUAL EXPLOITATION OF MINORS
[18 U.S.C. §§ 2252(a)(4)(B) & 2252(b)(2)]**

Between on or about July 7, 2014, and on or about September 21, 2016, in the Eastern District of Oklahoma, the defendant, **THOMPSON CHRISTOPHER KYLE MANDRELL**, did knowingly possess, attempt to possess and access with intent to view matters which contained visual depictions, as that term is defined in Title 18, United States Code, Section 2256(5), the production of said visual depictions involved the use of minors engaging in sexually explicit conduct, as that term is defined in Title 18, United States Code, Sections 2256(2)(A)-(B), and said visual depictions were of such sexually explicit conduct and had been transported in interstate commerce by computer, in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

CRIMINAL FORFEITURE ALLEGATION
[18 U.S.C. § 2253 & 28 U.S.C. § 2461(c)]

Upon conviction of Possession of Certain Material Involving the Sexual Exploitation of Minors, as alleged in Count One above, the defendant, **THOMPSON CHRISTOPHER KYLE MANDRELL**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, and Title 28, United States Code, Section 2461(c):

- a. Any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

The property to be forfeited includes, but is not limited to, the following:

- Digital (U) Toshiba Storage Device, Serial Number 33OYSURTSTS8;
- Digital (U) Toshiba Storage Device, Serial Number 452YSBQVSTK8;
- Digital (U) Sandisk thumbdrive, 16 GB, Serial Number: unknown;
- Digital (U) Huawei Cell phone Serial Number: unknown;
- Digital (U) Samsung Boost Mobile Phone Serial Number: unknown;
- Digital (U) Compaq Presario, Serial Number: CQ57;
- Digital (U) Dell laptop / Black Serial Number: unknown.

DOUGLAS A. HORN
Acting United States Attorney



D. EDWARD SNOW, OBA #16439
Assistant United States Attorney

A TRUE BILL:

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

s / Foreperson
FOREPERSON OF THE GRAND JURY